

REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY

Debtor Abel Martinez Case No 23-05990 Chapter 7
Moving Creditor Freedom Mortgage Corporation Date Case Filed May 5, 2023

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe): __

Chapter 7

☐ No-Asset Report Filed on _____
☒ No-Asset Report not Filed, Date of Creditors Meeting September 8, 2023

1. Collateral
 - a. ☒ Home
 - b. ☐ Car _____
 - c. ☐ Other (describe) _____
2. Balance Owed as of August 7, 2023 \$136,230.07
Total of all other Liens against Collateral \$N/A (per debtor's schedule)
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the Debtor post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$220,000.00 (per Debtor's Schedules)
5. Default
 - a. ☒ Contractual Default
Number of months 3 Amount \$4,051.34
 - b. ☐ Post-Petition Default
 - i. ☐ On direct payments to the moving creditor
Number of months _____ Amount \$ _____
 - ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____
6. Other Allegations
 - a. ☐ Lack of Adequate Protection § 362(d)(1)
 - i. ☐ No insurance
 - ii. ☐ Taxes unpaid Amount \$ _____
 - iii. ☐ Rapidly depreciating asset
 - iv. ☐ Other (describe) _____
 - b. ☐ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - c. ☒ Other "Cause" § 362(d)(1)
 - i. ☐ Bad Faith (describe) _____
 - ii. ☐ Multiple Filings
 - iii. ☒ Other (describe) Material payment default
 - d. Debtor's Statement of Intention regarding the Collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☒ Surrender
 - iv. ☐ No Statement of Intention Filed

Date: 08/15/2023

Submitted By:

/s/ Kinnera Bhoopal

ARDC# 6295897

McCalla Raymer Leibert Pierce, LLC